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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON – PORTLAND DIVISION

CALISTA ENTERPRISES LTD.,
a Republic of Seychelles company,

Plaintiff/Counter-defendant,

- v. -

TENZA TRADING LTD.,
a Cyprus company,

Defendant/Counterclaimant.

Case No. 3:13-cv-01045-SI

**CALISTA ENTERPRISES LTD.’S
MOTION FOR ADOPTION OF
PROPOSED ORDER REGARDING
CALISTA’S DISCOVERY REQUESTS
ADDRESSED IN JANUARY 31, 2014
HEARING**

LR 7.1 CERTIFICATION

Pursuant to Local Rule 7-1, undersigned counsel conferred in good faith with counsel for Defendant Tenza Trading Ltd. to resolve the dispute and has been unable to do so.

MOTION

Plaintiff Calista Enterprises, Ltd. (“Calista”), by and through undersigned counsel, hereby

moves the Court, for an order: (i) adopting Calista's attached proposed form of order concerning the January 31, 2014 telephonic discovery conference and (ii) granting such other and further relief as the Court may deem just, proper and equitable.

This motion is supported by the accompanying Memorandum of Law, the Attorney Declaration & Exhibit filed herewith, and the pleadings on file herein.

Dated: February 27, 2014

Respectfully submitted,

Plaintiff/Counter-defendant
Calista Enterprises Ltd.
By its Attorneys,

/s/ Matthew Shayefar
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